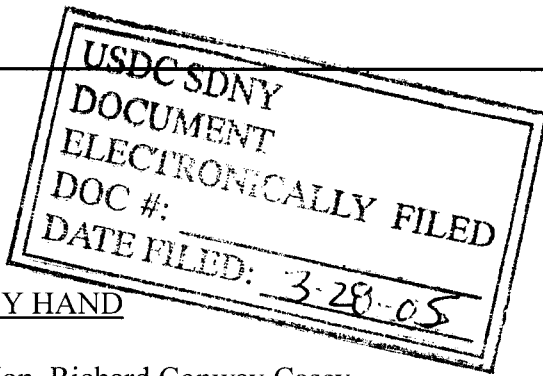


U.S. Department of Justice

United States Attorney

Southern District of New York



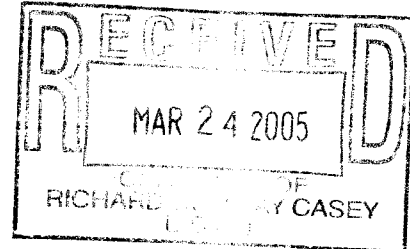
86 Chambers Street, 3rd Floor
New York, New York 10007

March 23, 2005

ELF

BY HAND

Hon. Richard Conway Casey
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 1350
New York, New York 10007-1312



Re: Ebadi v. Office of Foreign Assets Control, No. 04 Civ. 8420 (RCC)

Dear Judge Casey:

I write respectfully to request with consent of plaintiffs a further extension of the briefing schedule in the above-referenced matter, which challenges certain Treasury Department regulations on statutory and constitutional grounds. If this request is granted, the Government's deadline to submit opposition to plaintiffs' motion for a preliminary injunction would be extended from March 25, 2005, to April 8, 2005, and plaintiffs' time to submit reply papers would be extended from April 25, 2005, to May 9, 2005.

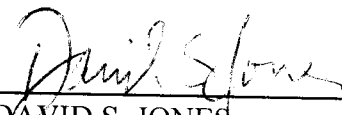
The parties are continuing discussions concerning the application of and justification for the Treasury Department's regulations at issue, as modified by general licenses issued on December 17, 2004, and have been actively exploring a possible consensual resolution of the matter. The parties respectfully request the additional extension to continue those discussions. While the parties cannot predict whether they will succeed, they hope to reach a consensual conclusion to the litigation.

As previously noted, depending on the course of the parties' discussions and should any dispute remain, the Government respectfully reserves the right to seek additional time to submit papers, and/or a Court conference to discuss the most appropriate case management approach for litigation of any unresolved disputes.

I respectfully request that this letter be "so ordered" and docketed to authorize the agreed-upon extension. Thank you for your consideration.

Respectfully,

DAVID N. KELLEY
United States Attorney

By: 
DAVID S. JONES
Assistant United States Attorney
Tel.: (212) 637-2739
Fax: (212) 637-2686

cc (by fax): Philip Allen Lacovara, Esq. (by fax 212-849-5585)

Application granted

3/24/05

